

Ms. Erinn D. Larkin
Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
Washington, DC 20463

Re: Human Rights Campaign PAC (September 2008 Monthly Report)
Identification Number: C00235853

Dear Ms. Larkin:

This letter responds to your request for additional information dated October 31, 2008 regarding HRC PAC's September 2008 Monthly Report.

1. The totals listed on Line 11(a)(1) and 11(a)(ii), Column B of the Detailed Summary Page, were incorrectly reported due to an internal clerical error using the NGP software to amend the August 2008 Monthly Report on September 19, 2008. The figures stated on the originally-filed and first amended August 2008 Monthly Reports were correct. The same clerical error also caused incorrect figures to be reported on the September 2008 monthly report, which was filed the same day as the second amended August 2008 Monthly Report. We regret the clerical error and have now amended both reports to reflect the correct calendar-year figures.

2 & 3. We have detailed on several occasions HRC PAC's procedures to comply with the FEC's "best efforts" regulations and are comfortable that current procedures meet and even exceed current FEC requirements.

HRC PAC has taken the following steps over the past year to establish "best efforts":

" All HRC PAC solicitations included a clear and conspicuous request for contributor information and informed contributors of the requirements of federal law for the reporting of such information.

" In response to previous letters, HRC PAC initiated a further review of its procedures in order to obtain updated contributor information from automatic recurring contributors (e.g, PAC contributors who have authorized periodic credit card payments). On May 27, 2008, HRC PAC mailed "best efforts" letters to all recurring PAC contributors (more than 500 individuals) requesting updated contributor information. These letters were sent both to recurring contributors for whom the PAC did not have any employer and occupation information as well as recurring contributors for whom this information may be outdated. HRC PAC has established a time schedule for requesting updated information in the future from recurring contributors.

" HRC PAC has mailed timely "best efforts" letters to one-time PAC contributors in compliance with FEC regulations.

" HRC PAC has previously mailed "best efforts" letters to all individuals you identified in the attached chart, notifying them that the employer and/or occupation information they provided is inadequate. We also have initiated further steps to integrate your guidance into our future "best efforts" procedures.

" HRC PAC has received updated information from contributors in response to these letters and is in the process of amending reports to reflect newly-received information. We anticipate that recent reports will be amended by December 15, 2008. Future reports will be amended as appropriate.

" HRC PAC has reviewed and updated internal procedures for ensuring that "best efforts" are used throughout the year for both one-time and recurring contributors in compliance with FEC regulations. Internal accountants and counsel have

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reviewed these procedures and initiated additional steps that meet and sometimes even exceed the disclosure requirements.

4. In reviewing the September 2008 Monthly Report we believe that federal operating expenditures were properly categorized on Schedule B, supporting Line 21(b) of the Detailed Summary Page. We would appreciate further guidance if you continue to have concerns.

I hope this additional information answers your specific requests. Should you need further information, please feel free to contact me at (202) 216-1549 or Darrin Hurwitz, HRC staff counsel, at (202) 572-8914.

Sincerely,

Jim Rinefierd
Treasurer
